

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
JOSEPH ANDREW VALENZIA : CASE NO. 1:21-00471-HWV
aka JOSEPH ANDRES VALENZIA, II :
Debtor :
: CHAPTER 13
PNC BANK, NATIONAL :
ASSOCIATION :
Movant :
: v. :
: :
JOSEPH ANDREW VALENZIA :
aka JOSEPH ANDRES VALENZIA, II :
Respondent :
:

**DEBTOR'S RESPONSE TO MOTION OF
PNC BANK, NATIONAL ASSOCIATION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, comes Debtor, Joseph Andrew Valenzia, by and through his attorney, Gary J. Imblum, and respectfully respond as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part and denied in part. Debtor has no knowledge of the holder of the mortgage. Strict proof is demanded.
5. Admitted.
6. Admitted. Further, Debtor offers to cure same through an Amended Plan.
7. Admitted in part and denied in part. See response to paragraph 6.
8. Denied. The property was worth \$125,000.00 according to the market analysis from early 2021. The amount owed on the first mortgage at the time of the filing of the bankruptcy was

\$52,033.91 (see Proof of Claim of U.S. Bank). The amount owed on the second mortgage to PNC Bank at the time of the filing of the bankruptcy was \$62,504.44 (see Proof of Claim filed by PNC Bank). In the last two years properties have appreciated greatly in value. Accordingly, it is believed and hereby averred that there is a significant equity cushion providing adequate protection to the Movant.

9. Admitted.

10. Admitted.

WHEREFORE, Debtor respectfully requests that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



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Attorney for Debtor

DATED: 5-9-23

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTOR'S RESPONSE TO MOTION OF PNC BANK, NATIONAL ASSOCIATION FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

JACK N. ZAHAROPOULOS, ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

BRIAN C. NICHOLAS, ESQUIRE
KML LAW GROUP, P.C.
COUNSEL FOR MOVANT
VIA E-SERVICE

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DATED: 5/09/2023